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25 UNITED STATES DISTRICT COURT  
26 NORTHERN DISTRICT OF CALIFORNIA

27 ERIC HALVORSON, LAURA FERRER, PETER  
28 DALLMAN, ROBERT GRANA, DENNIS  
BULCAO, and NEIL YOUNG, individually, as  
representatives of the classes, and on behalf of the  
general public,

29 Plaintiffs,

30 v.

31 TALETBIN, INC.,

32 Defendant.

33 Case No. 3:15-cv-05166-JCS

34 **STIPULATION TO EXTEND  
35 TIME FOR FILING MOTION  
36 FOR PRELIMINARY  
37 APPROVAL OF CLASS ACTION  
38 SETTLEMENT AND CONTINUE  
39 CASE MANAGEMENT  
40 CONFERENCE**

41 STIPULATION TO EXTEND TIME FOR FILING MOTION FOR PRELIMINARY APPROVAL OF  
42 CLASS ACTION SETTLEMENT AND CONTINUE CASE MANAGEMENT CONFERENCE  
43 CASE No. 3:15-cv-05166-JCS

1 Pursuant to Civil Local Rule 6-1(b), plaintiffs Eric Halvorson, Laura Ferrer, Peter  
2 Dallman, Robert Grana, Dennis Bulcao, and Neil Young (“Plaintiffs”) and defendant TalentBin,  
3 Inc. (“Defendant”), through their undersigned counsel, hereby stipulate as follows:

4 WHEREAS, on August 19, 2016, the parties filed a Notice of Settlement and Stipulation  
5 to Vacate Litigation Deadlines;

6 WHEREAS, the Court set a September 19, 2016 deadline for the parties to file for  
7 preliminary approval of the settlement;

8 WHEREAS, the Court set a Case Management Conference for September 23, 2016 at  
9 2pm;

10 WHEREAS, the parties require additional time to complete the confirmatory discovery  
11 agreed to as part of the settlement;

12 WHEREAS, the parties are near to executing, but have not yet executed a formal  
13 settlement agreement memorializing the terms agreed to at mediation;

14 WHEREAS, the parties agree that they require 30 days to complete the confirmatory  
15 discovery, to execute the settlement agreement, and to prepare a motion for preliminary approval;

16 WHEREFORE, the parties request that the Court extend the deadline to file for  
17 preliminary approval to October 19, 2016 and continue the Case Management Conference until a  
18 date thereafter that is convenient for the Court.

19 Pursuant to Local Rule 6-1(b), the parties request that the deadline for filing for preliminary  
20 approval be extended to October 19, 2016 and continue the Case Management Conference to a date  
21 thereafter that is convenient for the Court.

22 Dated: September 13, 2016

MORRISON & FOERSTER LLP

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24 By: /s/ Angela E. Kleine  
Angela E. Kleine

25 Attorneys for Defendant  
26 TALENTBIN, INC.

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28 STIPULATION TO EXTEND TIME FOR FILING MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT AND CONTINUE CASE MANAGEMENT CONFERENCE CASE  
NO. 3:15-cv- 05166-JCS

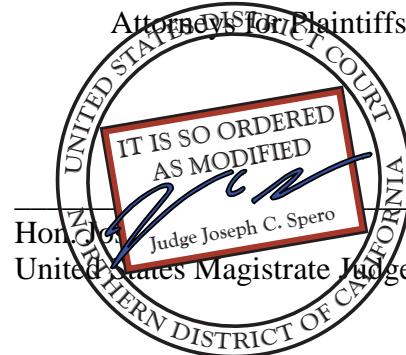
1 Dated: September 13, 2016

BERGER & MONTAGUE, P.C.

2 By: /s/ John G. Albanese  
3 John G. Albanese

4  
5 **IT IS SO ORDERED.**

6 Date: 09/14/16



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11 IT IS HEREBY FURTHER ORDERED that the further case management conference, set for  
12 Sept. 23, 2016, at 2:00 PM has been continued to Oct. 28, 2016, at 2:00 PM. An updated joint  
13 case management conference statement shall be filed by Oct. 21, 2016.

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28 CLASS ACTION SETTLEMENT AND CONTINUE CASE MANAGEMENT CONFERENCE CASE  
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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

I, John G. Albanese, am the ECF User filing this STIPULATION TO EXTEND TIME FOR FILING MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND CONTINUE CASE MANAGEMENT CONFERENCE. In compliance with Civil Local Rule 5-1, I hereby attest that Angela E. Kleine concurred in this filing.

7 || Dated: September 13, 2016

*/s/ John G. Albanese*

John G. Albanese

Attorney for Plaintiffs

28 STIPULATION TO EXTEND TIME FOR FILING MOTION FOR PRELIMINARY APPROVAL OF  
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